

**To:** Higginbotham, Paul[PHIGGINB@idem.IN.gov]  
**From:** Ireland, Scott  
**Sent:** Thur 10/1/2015 2:35:33 PM  
**Subject:** RE: Revised draft IN NPDES general permit for Ground Water Petroleum Remediation Systems ING080000

Paul,

In re-reading this statement from Catherine below:

The Environmental Rules Board final adopted the rule changes to 327 IAC 5 and 15 at its July 8, 2015 meeting. This is the rule change which enables IDEM to transition from the permit-by-rule to the administrative general permits for the 5 permits which were public noticed on December 15, 2014. We are anticipating the rule change to become effective in less than 90 days (by mid-November, 2015).

How does this transition take place? Are the folks currently permitted automatically granted approval under the GP once the rule change takes effect or does everyone have to re-submit an NOI?

Thanks,

Scott

D. Scott Ireland

Chief, Section 1

NPDES Programs Branch

77 West Jackson Blvd., MC: WN-16J

Chicago, IL 60604

(312) 886-8121

[Ireland.Scott@epa.gov](mailto:Ireland.Scott@epa.gov)

**From:** Higginbotham, Paul [mailto:PHIGGINB@idem.IN.gov]  
**Sent:** Monday, September 28, 2015 10:28 AM  
**To:** chess@idem.IN.gov; Ireland, Scott  
**Cc:** RIGNEY, STAN; Bell, Brian; Pierard, Kevin; Newport, Robert; JORDAN, SHERI; Burget, Catherine A; Pepin, Rob  
**Subject:** RE: Revised draft IN NPDES general permit for Ground Water Petroleum Remediation Systems ING080000

Scott –

Quick question, does EPA have a listed of preferred PAH's to monitor for as part of this GP?

Thanks.

**From:** Hess, Catherine  
**Sent:** Monday, September 28, 2015 10:48 AM  
**To:** Ireland, Scott  
**Cc:** Higginbotham, Paul; RIGNEY, STAN; Bell, Brian; Pierard, Kevin; Newport, Robert; JORDAN, SHERI; Burget, Catherine A; Pepin, Rob  
**Subject:** RE: Revised draft IN NPDES general permit for Ground Water Petroleum Remediation Systems ING080000

The lead monitoring was included based upon information from our Office of Land Quality because it could be present when investigating aviation gas, racing fuel, and when automotive gas was used or stored before January 1, 1996. If it is found at levels that would cause reasonable potential to exceed it could result in the need for the applicant to seek an individual permit, or it could even result in limits being added to the GP authorization. Our modeling staff have advised that they have hardness data if needed for calculating WQBELs for lead. We have rarely (if ever) asked an applicant to provide such data.

**From:** Ireland, Scott [<mailto:ireland.scott@epa.gov>]

**Sent:** Thursday, September 24, 2015 4:18 PM

**To:** Hess, Catherine

**Cc:** Higginbotham, Paul; RIGNEY, STAN; Bell, Brian; Pierard, Kevin; Newport, Robert; JORDAN, SHERI; Burget, Catherine A; Pepin, Rob

**Subject:** RE: Revised draft IN NPDES general permit for Ground Water Petroleum Remediation Systems ING080000

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Catherine,

Thanks for the response. As we understand it, the NOI requires a characterization of the groundwater to be remediated. If the lead found in the groundwater is above the water quality standard, then we assume those facilities would be required to apply for and individual permit. Is the purpose of the monitoring to collect data to determine of a permit limit is necessary in the next GP? If so, isn't receiving water hardness information needed to conduct a reasonable potential analysis?

Also, it is not necessary for the permittee to collect this if it can be obtained somewhere else.

Thanks,

Scott

D. Scott Ireland

Chief, Section 1

NPDES Programs Branch

77 West Jackson Blvd., MC: WN-16J

Chicago, IL 60604

(312) 886-8121

[Ireland.Scott@epa.gov](mailto:Ireland.Scott@epa.gov)

**From:** Hess, Catherine [<mailto:CHESS@idem.IN.gov>]

**Sent:** Wednesday, September 23, 2015 3:01 PM

**To:** Ireland, Scott

**Cc:** Higginbotham, Paul; RIGNEY, STAN; Bell, Brian; Pierard, Kevin; Newport, Robert; JORDAN, SHERI; Burget, Catherine A

**Subject:** RE: Revised draft IN NPDES general permit for Ground Water Petroleum Remediation Systems ING080000

Thanks Scott. We're making edits to specify that the lead monitoring shall be total recoverable lead. We typically do not require permittees/applicants to provide us with hardness data. I am uncertain as to the value of that information for this lead monitoring requirement. Is there a particular reason why you feel it is necessary? I'm assuming that you are referring to the hardness of the receiving stream, and not the hardness value of the ground water which is being remediated.

We are also adding PAHs to the NOI and the general permit. We have listed it as a wastewater characteristic parameter on the Notice of Intent form, and have specified which pollutants are to be used in the calculation. This is based on Ohio EPA's GP for ground water corrective action permits. The general permit itself now contains the conditional monitoring requirement for PAHs on a once monthly basis if they are found to be present based on the wastewater characterization in the NOI.

I am attaching the newly revised documents. I have not done a redline version for this, but I can. For the permit, the revised text appears on page 5. For the NOI, the revisions appear on page 3. For the fact sheet, see page 8. I have used yellow highlights on all of these documents to denote the changes since the last draft.

We are preparing to public notice this permit for a second time in the very near future. If you have any major discomfort with this latest version, please feel free to contact me.

Sincerely,

Catherine Hess, Chief

Office of Water Quality, Permits Administration Section

Indiana Department of Environmental Management

(800) 451-6027, ext. 28704 (toll free within IN)

(317) 232-8704

[chess@idem.IN.gov](mailto:chess@idem.IN.gov)

**From:** Ireland, Scott [<mailto:ireland.scott@epa.gov>]

**Sent:** Tuesday, September 22, 2015 5:10 PM

**To:** IDEM OWQ WW Permits

**Cc:** Higginbotham, Paul; RIGNEY, STAN; Hess, Catherine; Bell, Brian; Pierard, Kevin; Newport, Robert

**Subject:** Re: Revised draft IN NPDES general permit for Ground Water Petroleum Remediation Systems  
ING080000

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

We have reviewed the GP for GW Petroleum Remediation Systems (ING080000) and have the following comments/questions.

## Part 2.1 – Discharge Limitations

1. Table 3 should specify the type analysis needed for Lead (total or total recoverable) and specify a hardness value or how the hardness value shall be determined.
2. Other State general permits of this type (OH, WI, WV, CA, CT) include either limits or monitoring for PAHs, which might be present in heavier products such as diesel fuel. Did IDEM consider PAH limits or monitoring?

Scott

D. Scott Ireland

Chief, Section 1

NPDES Programs Branch

77 West Jackson Blvd., MC: WN-16J

Chicago, IL 60604

(312) 886-8121

[Ireland.Scott@epa.gov](mailto:Ireland.Scott@epa.gov)

On December 15, 2014 the Indiana Department of Environmental Management (IDEM) public noticed a draft of the new administrative NPDES general permit for groundwater petroleum remediation systems. The draft NPDES general permit differed from the NPDES general permit-by-rule mostly by virtue of the fact that it was in a new format. We are referring to this new format as an “administrative NPDES general permit” and it will supersede and replace the requirements for these discharges which are currently regulated under Article 15 of Title 327 of

the Indiana Administrative Code.

The December 2014 draft general permit stated that its purpose was to establish requirements for point source discharges from any conveyance used for collecting and conveying wastewater which is directly related to ground water petroleum remediation systems or activities, but specifically those which involve gasoline contamination of the ground water. We had made this distinction due to concerns which had been raised by U.S. EPA during its early review of the initial draft general permit, because it only contained effluent limitations for benzene and pH. During the official public notice comment period, IDEM received several comment letters requesting that we expand the scope of the general permit coverage to include other types of petroleum-based contaminants, such as diesel fuel and kerosene, as these types of contaminants may also be present in the ground water due to leaking underground storage tanks at the gas stations and truck stops which are typical of the facilities with ground water remediation systems. After consultation with the staff of the Office of Land Quality's Leaking Underground Storage Tank program, we have developed a second draft NPDES general permit which removes the restricted definition of "petroleum" to also be inclusive of diesel fuel, kerosene, and similar products that might be found at a gas station or truck stop, such that more facilities could be covered by the general permit.

The Environmental Rules Board final adopted the rule changes to 327 IAC 5 and 15 at its July 8, 2015 meeting. This is the rule change which enables IDEM to transition from the permit-by-rule to the administrative general permits for the 5 permits which were public noticed on December 15, 2014. We are anticipating the rule change to become effective in less than 90 days (by mid-November, 2015).

**Therefore we are asking that you give the 3 attached documents an expeditious review, so that we can complete the second public notice and have this permit ready to issue by the time the rule change goes into effect. The draft general permit and fact sheet are being transmitted to you as red-lined versions so that you can clearly see exactly what changes have been made to the documents since the first public noticed draft was released on December 15, 2014. Please focus your review on the edits of the documents in order to streamline the review time. If possible, we would really appreciate it if you could please review these documents and provide us with feedback by no later than Friday, September 11, 2015.**

Questions may be directed to any of the following IDEM staff: C. Anne Burget at (317) 234-8745, Sheri Jordan at (317) 232-8703, or Catherine Hess at (317) 232-8704. Please send any email inquiries to [owqwwper@idem.in.gov](mailto:owqwwper@idem.in.gov) which is a generic email address to which all 3 of us have access. We look forward to hearing from you.

Catherine Hess, Chief

Permits Administration Section

IDEM, Office of Water Quality

Email: [chess@idem.IN.gov](mailto:chess@idem.IN.gov)

Phone: (317) 232-8704